

In The United States District Court  
For The District of South Carolina  
RECEIVED USDC  
CLERK, CHARLESTON, SC

Tequan L. Brown,  
Plaintiff,

vs.

Jim May, Jeffery long,  
Alan Wilson,  
Jeffery Scott,  
Bryan P. Stirling,  
Timothy R. Rainey,  
Defendants

C/A No.

2018 DEC 12 AM 8:59

Complaint  
(Jury Trial Demanded)

Sued Individually and  
Official Capacities

## I. JURISDICTION AND VENUE

1.) This is a civil action authorized by 42 U.S.C. Section 1983 to redress the deprivation, Under Color of Federal, and State law, rights Secured by the Constitution of the United States. The Court has Jurisdiction Under 28 U.S.C. Section 1331 and 1343 (a)(3). Plaintiff seeks declaratory relief Pursuant to 28 U.S.C. Section 2201 and 2202. Plaintiff Claims for injunctive relief are authorized by 28 U.S.C. Section 2283 and 2284, and Rule 65 of the Federal Rules of Civil Procedure.

2.) The Charleston Division of the District of South Carolina is an appropriate Venue under 28 U.S.C Section 1391(b)(2) because it is Where the main event occurred.

## II. PLAINTIFF

3.) Plaintiff Tequan L. Brown, is and was at all times Mentioned herein, a Prisoner of the State of South Carolina in the Custody of the South Carolina Department of Corrections. Plaintiff is Currently Confined at McCormick Correctional Institution in Protective Custody, in McCormick South Carolina.

## III. DEFENDANTS.

4.) Defendant Jim May is an Assistant U.S. Attorney for the District of South Carolina Who at all times Mentioned in this Complaint.

5.) Defendant Jeffery long is an FBI Agent Who is at all times mentioned in this Complaint.

6.) Defendant Alan Wilson is the State Attorney General and Chief law Enforcement Officer Who is at all times mentioned in this Complaint.

- 7.) Defendant Jeffery Scott is a Assistant Chief of Police Services Gang Unit Division of the S.C. Dept of Corrections, Who is at all times mentioned in this Complaint.
- 8.) Defendant Bryan P. Stirling is the Commissioner of S.C. Dept of Corrections, Who is at all times mentioned in this Complaint.
- 9.) Defendant Timothy R. Rainey #263244 is a Prisoner in S.C. Dept of Corrections, who is 3rd Party State Agent, Who is at all time mentioned in this Complaint.
- 10.) Each Defendant is sued individually and in they official capacity, at all times mentioned herein this Complaint each defendant acted under the color of Federal and State Law.

#### IV. STATEMENT OF FACTS

- 12) Each Defendant has Collectively Conspire to violate Plaintiff's Constitutional rights, Which has deprive the plaintiff of equal Protection of the laws of the State of South Carolina.
- 13.) On or about February 16, 2016 while at Perry Correctional Institution in Pelzer S.C. Plaintiff informed Defendant Scott of threats made on his life, and his mother's life by a Subject, or unknown Subject who Plaintiff believed to Shawn Taylor.
- 14.) The Subject on the cell phone made the threats in relation to the Brittanee Drexel murder Investigation.
- 15.) Plaintiff was Placed in Protective Custody due to the threats made, Defendant Scott informed the FBI of information Plaintiff had given.
- 16.) April 14, 2016 Jim May, Jeffery long, Jeffery Scott, and Detective Bean from MBP Came to Perry Correctional Institution to interview Plaintiff about Brittanee Drexel.

17.) On or About July 14, 2016 Plaintiff sent notice to Defendants May, and Scott informing them that he wanted no part of the Drexel Investigation and to null and void the Proffer Agreement and any, and all Declarations, Affidavits, and testimony given by Plaintiff.

( Notice of motion is Attached as Plaintiff's Exhibit A)

18.) On or about August 26, 2016 at approximately 12:00 P.M. Deputy Warden Jeanette Glenn at Perry Correctional Institution came to Plaintiff's cell to ask if he wanted protective custody. Plaintiff informed Deputy Warden that he did not want protective custody.

(See SCDC Form 19-47 Attached as Plaintiff's Exhibit-B)

19.) On or about August 26, 2016 at approximately 5:00 P.M. Defendants May, and long with reckless indifference to the value of Plaintiff's life, publicly called Plaintiff a SNITCH, the defendants release Plaintiff statement to the Post and Courier, and WCSC into the investigation of Brittanee Drexel rape and Murder.

- 20.) The release of Plaintiff's Statement to the local News media outlets is detrimental to Plaintiff's Safety in Prison, because of the defendant's reckless actions. it inflame the individuals responsible for Drexel Murder hatred for Plaintiff.
- 21.) Plaintiff Currently have a \$15,000 bounty on his head, and Currently have a Gang, Bloods trying to cash in on that bounty, Plaintiff is Currently in imminent danger of death or great bodily injury.
- 22.) Due to the current Problem within S.C. Dept of Corrections with Inmate having Cell phone ALL of the information is on the Internet for the World to See, anywhere the Plaintiff goes in the State or Bop Prison or Camp he will be known as a SNITCH, Police, RAT, PIG.
- 23.) Plaintiff and another Inmate has offer to the FBI, S.C. Attorney General, Jim May, and Colleton County Sheriff's Office Substantial Assistance to help bring this Investigation to an end. Plaintiff and another inmate has offer to provide truthful information including everything of evidentiary value to the Drexel Investigation.

24.) The Plaintiff Wrote Alan Wilson, Jim May, and Jeffery Scott informing that he wanted to help bring this to a end because every time there are a Press release Plaintiff's Name Comes up or on face book.

25.) Upon information and belief Defendant Wilson at the request of Defendant May, has deny Plaintiff his right to access the Court for PCR hearing, Plaintiff Filed PCR Forms with the Colleton County Clerk of Court over a year a go, Defendant Wilson and his office has yet to process Plaintiff's PCR Application to appoint Counsel.

26.) Defendants Rainey, and Dyke, On or about October 31, 2018 had a meeting With Defendant Scott, A Myrtle Beach Police Detective, and a Unknown FBI Agent, at this Said meeting Defendant Rainey, and Dyke both enter into A Cooperation Agreement with both State, and Federal Agents.

27.) Defendants Rainey, and Dyke was told to obtain information from Plaintiff, and they would receive a \$25,000 Cash reward.

- 28.) Upon Coming back into the Unit (swpc) Defendant Rainey Stated that he had a meeting with the FBI, and he told them Plaintiff was responsible for the rape, and Murder of Brittanee Drexel.
- 29.) Upon information given to Plaintiff by Defendant Dyke, Rainey after Coming back from meeting with Agents, Wanted him to lie on Plaintiff to corroborate what he told them, that Plaintiff was responsible. (See Dyke's Affidavit)
- 30.) After Dyke would not agree to do that, Rainey Sent Dyke a(kite) a jail house letter Stating he was going to stab him if he did not go along with his Plan.
- 31.) On or about September 7, 2018 Plaintiff informed Defendant Scott, Unknown FBI Agent, Detective from (MBP) that Defendant Rainey along with Tyrone King was trying to cash in on the bounty (\$15,000) on Plaintiff's head, Plaintiff also gave Defendant Scott a Kite i.e. Jail house letter from Rainey Stating he was Paid \$5,000.00 to stab Plaintiff.

- 32.) Defendant Rainey not only stated he was paid \$15,000.00 to stab Plaintiff, he also used his cell phone to call members of the Blood Gang to informed them that Plaintiff and another inmate was trying to record conversations between the other inmate and one of the assailants in the Drexel case about the Drexel case.
- 33.) Plaintiff also received another kite from Rainey stating that the bloods knew everything Plaintiff gave this kite i.e. Jail letter to Warden Williams.
- 34.) Plaintiff wrote Defendant Stirling informing him about Rainey carrying out gang hits within State-Wide Protective Custody.
- 35.) Plaintiff informed Stirling via Inmate Correspondence that Rainey, and Nathan Battle, on or about September 27<sup>th</sup>, 2018 Stabbed Dennis Sanders by orders of gang members on the yard, and that Rainey stated to Plaintiff that he was next

36.) Plaintiff himself informed Scott, Lt. Jones Stirling, Unknown FBI Agent, and a MBP Detective of the threats of physical harm coming from Rainey, and King, and Plaintiff believe them to be imminent, Plaintiff informed them in person, by letter, and or request to Staff members.

37.) Based on the fact that both State, and Federal Agents enter into an Cooperation Agreement with Rainey and Dyke after they were made aware of Rainey being Paid \$5,000, and upon information that Investigators told Rainey to do whatever he needed to do, Plaintiff believe its a Conspiracy.

38.) Due to the Department of Justice reckless disregard of Plaintiff's Safety within the Prison System Plaintiff can never be safely release to any General population anywhere because if someone google Plaintiff's name the Brittanee Drexel Case comes up.

39.) Plaintiff has done all he knows how to help Investigators, both Federal, and State bring their Investigation to a end so that Plaintiff's name can be taken off the Internet.

## V. LEGAL CLAIMS

- 40.) Plaintiff reallege and incorporate by reference Paragraphs 1-39.
- 41.) Plaintiff alleges that each defendant has Conspire to violate his civil rights.
- 42.) Deny Plaintiff access to the Court (PCR Hearing)
- 43.) Deny Plaintiff Equal Protection of laws and Equal Treatment. Dissimilar Treatment based on race.
- 44.) Impermissible Punishment, Reckless Endangerment

## VI. PRAY FOR RELIEF

- 45.) WHEREFORE, Plaintiff request respectfully that this Court enter Judgment:
- 46.) Granting Plaintiff a Declaratory that the acts and omissions described herein Violated his rights under the Constitution and laws of the United States, and
- 47.) A permanent injunction ordering Defendant Stirling to investigate the actions of Defendant Rainey within State-wide Protective Custody,

also ordering Defendant Stirling to remove Rainey from the (SWPC) unit for the safety of ALL therein.

- 48.) A Permanent injunction ordering Defendant Wilson to process Plaintiff's PCR Application
- 49.) A injunction Ordering Defendant May to have Plaintiff's name taken off the internet in all matters dealing with the Drexel Case.
- 50.) A injunction ordering Defendants May and Wilson to file any, and all motions Pursuant to S.C. Ann. Code §§ 17-25-65
- 51.) A injunction ordering Defendants May, Scott, and the FBI to seek the truth from Defendant Rainey, and only the truth.
- 52.) Plaintiff request for any additional relief this court deems just, proper and equitable

Dated: Nov. 16, 2018

Respectfully Submitted

T. Brown

Tequan L. Brown # 34191S-  
Plaintiff,  
McCormick Correctional Inst.  
386 Redemption Way  
McCormick S.C. 29899

## VERIFICATION

I have read the foregoing Complaint and hereby Verify that the matters alleged therein are true, except as to matters alleged on information and belief, and as to those, I believe them to be true. I Certify Under Penalty of Perjury that the foregoing is true and correct.

Executed at McCormick Correctional Institution  
McCormick, South Carolina 11/16/18

  
Tequan L. Brown  
McCormick Correctional Institution  
386 Redemption Way  
Columbia Sc. 29899